

EXHIBIT

12

Maximilian D. Cadmus

From: Steve Harvey <steve@steveharveylaw.com>
Sent: Sunday, April 11, 2021 10:27 AM
To: Eric W. Moran
Cc: Mike Gehring; Theodora McCormick; Maximilian D. Cadmus
Subject: RE: Ryu v. Bank of Hope
Attachments: 2021.04.07 Joint Discovery Plan.docx

*** EXTERNAL EMAIL ***

Dear Eric:

Please find a draft of the joint discovery plan. I am sorry that I did not get it to you earlier. It is due on Monday but not until the end of the day.

You can just let me know your views please on what I filled in and on the subjects I left blank, including the various deadlines. I think 6 months for discovery should be enough but if you want to go for more than that please let me know and the other deadlines will be derived from that deadline.

As for initial disclosure, please tell me when you want to do that. We are ready to do that when you are.

In our recent phone call, you asked if section b of the prayer for relief in the Complaint is in play. The answer is no, that related only to Count I.

Please let me know about items b-e in the prayer for relief in the Bank's counterclaim. I do not think that you have any basis to seek any of that relief given the allegations.

Thank you.

Stephen G. Harvey
Steve Harvey Law LLC
1880 John F. Kennedy Blvd.
Suite 1715
Philadelphia, PA 19103
215.438.6600
[vCard](#)

The information contained in this email message is intended only for use of the intended recipient. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify the sender and destroy the original message. The information contained in this communication may be confidential and may be subject to the attorney-client privilege. If you are the intended recipient and you do not wish to receive similar electronic messages in the future, then please respond to the sender to this effect. Thank you.

From: Eric W. Moran <EMoran@ebglaw.com>
Sent: Monday, March 22, 2021 2:40 PM
To: Steve Harvey <steve@steveharveylaw.com>
Cc: Mike Gehring <mike@steveharveylaw.com>; Theodora McCormick <TMcCormick@ebglaw.com>
Subject: RE: Ryu v. Bank of Hope

This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Steve,

The Rule 16 conference is scheduled for April 19. We are available to meet and confer regarding a joint discovery plan on Thursday the 25th, Friday the 26th or Monday the 29th (after reviewing Ryu's Answer to the Bank's counterclaim). I assume you will be taking the lead in preparing your views on what should be included in the proposed joint discovery plan in respect of Count 2, which we request to review ahead of our meet-and-confer.

Separately, plaintiff is in default of its obligation to file an Answer to the Bank's Counterclaim. Rather than address it with the Court, that is one of the dates we wished to discuss. To the extent you determine to request an extension of time, we would consent to such extension through Thursday, March 25.

Thanks,

Eric

EPSTEIN
BECKER
GREEN

Eric W. Moran | [Bio](#)
t 212.351.4510 | m 908.770.0355 | f 212.878.8600
EMoran@ebglaw.com

875 Third Avenue | New York, NY 10022
t 212.351.4500 | www.ebglaw.com

Think Green. Please consider the environment before you print this message. Thank you.

From: Steve Harvey <steve@steveharveylaw.com>
Sent: Monday, March 22, 2021 1:21 PM
To: Eric W. Moran <EMoran@ebglaw.com>
Cc: Mike Gehring <mike@steveharveylaw.com>; Theodora McCormick <TMcCormick@ebglaw.com>
Subject: RE: Ryu v. Bank of Hope

*** EXTERNAL EMAIL ***

Thank you. Please let me know your thoughts on dates re the Rule 16 and I will respond in writing.

If that is all you wish to discuss, it does not appear that there is a need for a phone call at this time.

[REDACTED] Also, if after you propose date re the Rule 16 there are other matters we need to discuss in prep for that, we can talk further by phone if necessary.

Stephen G. Harvey
Steve Harvey Law LLC
1880 John F. Kennedy Blvd.
Suite 1715
Philadelphia, PA 19103
215.438.6600
[vCard](#)

The information contained in this email message is intended only for use of the intended recipient. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify the sender and destroy the original message. The information contained in this communication may be confidential and may be subject to the attorney-client privilege. If you are the intended recipient and you do not wish to receive similar electronic messages in the future, then please respond to the sender to this effect. Thank you.

From: Eric W. Moran <EMoran@ebglaw.com>
Sent: Monday, March 22, 2021 12:19 PM
To: Steve Harvey <steve@steveharveylaw.com>
Cc: Mike Gehring <mike@steveharveylaw.com>; Theodora McCormick <TMcCormick@ebglaw.com>
Subject: RE: Ryu v. Bank of Hope

This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Sure – dates around the upcoming Rule 16 conference and [REDACTED] What time works best?

EPSTEIN
BECKER
GREEN

Eric W. Moran | [Bio](#)
t 212.351.4510 | m 908.770.0355 | f 212.878.8600
EMoran@ebglaw.com

875 Third Avenue | New York, NY 10022
t 212.351.4500 | www.ebglaw.com

Think Green. Please consider the environment before you print this message. Thank you.

From: Steve Harvey <steve@steveharveylaw.com>
Sent: Monday, March 22, 2021 11:01 AM
To: Eric W. Moran <EMoran@ebglaw.com>
Cc: Mike Gehring <mike@steveharveylaw.com>; Theodora McCormick <TMcCormick@ebglaw.com>
Subject: RE: Ryu v. Bank of Hope

*** EXTERNAL EMAIL ***

I can do it but let me check with Mike. Can you tell us what you would like to discuss?

Stephen G. Harvey
Steve **Harvey** Law LLC
1880 John F. Kennedy Blvd.
Suite 1715
Philadelphia, PA 19103
215.438.6600
[vCard](#)

The information contained in this email message is intended only for use of the intended recipient. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify the sender and destroy the original message. The information contained in this communication may be confidential and may be subject to the attorney-client privilege. If you are the intended recipient and you do not wish to receive similar electronic messages in the future, then please respond to the sender to this effect. Thank you.

From: Eric W. Moran <EMoran@ebglaw.com>
Sent: Monday, March 22, 2021 10:50 AM
To: Steve Harvey <steve@steveharveylaw.com>
Cc: Mike Gehring <mike@steveharveylaw.com>; Theodora McCormick <TMcCormick@ebglaw.com>
Subject: Ryu v. Bank of Hope

This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Steve – would you have a few minutes for a call today? We could be available after 3:30.



Eric W. Moran | [Bio](#)
t 212.351.4510 | m 908.770.0355 | f 212.878.8600
EMoran@ebglaw.com

875 Third Avenue | New York, NY 10022
t 212.351.4500 | www.ebglaw.com

Think Green. Please consider the environment before you print this message. Thank you.

CONFIDENTIALITY NOTE: This communication is intended only for the person or entity to which it is addressed and may contain information that is privileged, confidential or otherwise protected from disclosure. Dissemination, distribution or copying of this communication or the information herein by anyone other than the intended recipient, or an employee or agent responsible for delivering the message to the intended recipient, is prohibited. If you have received this communication in error, please call the Help Desk of Epstein Becker & Green, P.C. at (212) 351-4701 and destroy the original message and all copies. Pursuant to the CAN-SPAM Act this communication may be considered an advertisement or solicitation. If you would prefer not to receive future marketing and promotional mailings, please submit your request via email to ebgus@ebglaw.com or via postal mail to Epstein Becker & Green, P.C. Attn: Marketing Department, 875 Third Avenue, New York, NY 10022. Be sure to include your email address if submitting your request via postal mail.